

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 18, 2009

Name of company(s) covered by this certification: Thrane & Thrane, Inc.
Thrane & Thrane Airtime Ltd.

Form 499 Filer ID: N/A (Company does not provide interstate telecommunications or interstate telecommunications service) FRN 0005007927 & FRN 0014919682

Name of signatory: Svend Åge Lundgaard Jensen

Title of signatory: President

I, Svend Åge Lundgaard Jensen, certify that I am an officer of the companies named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company **is** in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company **has not** taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

If affirmative: **N/A**

The company **has not** received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

If affirmative: **N/A**

Signed



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Carrier Name, Address, Phone Number, Contact Person

Thrane & Thrane, Inc.
509 Viking Drive, Suites K, L, & M
Virginia Beach, VA 23452
Contact Person: Svend Åge Lundgaard Jensen, President

Thrane & Thrane, Inc. ("TT-Inc"), a telecommunications carrier, has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of consumer proprietary network information ("CPNI").

TT-Inc is currently engaged in the reselling of Inmarsat airtime for the following two Inmarsat land earth station operators: Stratos (formerly Xantic and Stratos) and Vizada (formerly France Telecom and Telenor). TT-Inc is also authorized by Inmarsat and the Federal Communications Commission to serve as an Inmarsat Service Provider and Point of Service Activation for the United States. In the course of business as a telecommunications provider, TT-Inc receives and holds in several secure databases Subscriber List Information (including customer names, addresses, email addresses, and phone numbers), CPNI consisting of customer billing records (including, but not limited to, detailed customer call records), and other related information used, processed, and maintained in the ordinary course of business relating to the resale of Inmarsat airtime.

- TT-Inc has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- TT-Inc continually educates and trains its employees regarding the appropriate use of CPNI. TT-Inc has established disciplinary procedures should an employee violate the CPNI procedures established by TT-Inc.
- TT-Inc maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. TT-Inc also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- TT-Inc has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, TT-Inc's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI.
- In accordance with Section 64.2009(e) of the Commission's rules, an officer of TT-Inc has executed a compliance certificate stating that the officer has personal knowledge that TT-Inc has established operating procedures that ensure compliance with the Commission's CPNI rules.

yes

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EB-06-TC-060

Carrier Name, Address, Phone Number, Contact Person

Thrane & Thrane Airtime Ltd.
509 Viking Drive, Suites K, L, & M
Virginia Beach, VA 23452
Contact Person: Svend Åge Lundgaard Jensen, President

Thrane & Thrane Airtime Ltd. ("TT-Air"), a telecommunications carrier, has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of consumer proprietary network information ("CPNI").

TT-Air is currently engaged in the reselling of BGAN airtime as an authorized Inmarsat Distribution Partner. TT-Air currently holds a Special Temporary Agreement ("STA") with the FCC for providing BGAN airtime services within the U.S. In the course of business as a telecommunications provider, TT-Air receives and holds in several secure databases Subscriber List Information (including customer names, addresses, email addresses, and phone numbers), CPNI consisting of customer billing records (including, but not limited to, detailed customer call records), and other related information used, processed, and maintained in the ordinary course of business relating to the resale of Inmarsat airtime.

- TT-Air has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- TT-Air continually educates and trains its employees regarding the appropriate use of CPNI. TT-Air has established disciplinary procedures should an employee violate the CPNI procedures established by TT-Air.
- TT-Air maintains a record of its sales and marketing campaigns that use its customers' CPNI. TT-Air also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- TT-Air has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, TT-Air's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI.
- In accordance with Section 64.2009(e) of the Commission's rules, an officer of TT-Air has executed a compliance certificate stating that the officer has personal knowledge that TT-Air has established operating procedures that ensure compliance with the Commission's CPNI rules.

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